

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA                     )  
  )  
                  v.                                 ) Criminal No. 04-39 Erie  
  )  
MICHELLE BRADFORD                            )

**GOVERNMENT'S MOTION TO REVOKE BOND**

AND NOW comes the United States of America, by and through its counsel, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Christian A. Trabold, Assistant United States Attorney for said district, and states as follows:

1. Michelle Bradford was indicted by a federal grand jury sitting in Erie, Pennsylvania on September 14, 2004. The indictment charged Bradford with multiple counts of mail fraud in violation of 18 U.S.C. § 1341.

2. At Bradford's arraignment, Magistrate Judge Baxter indicated that since Bradford was serving a state incarceration sentence in Pennsylvania, nominal bond would be set in Bradford's federal case, to be reviewed in the event of Bradford's pending release.

3. On June 8, 2005, Bradford entered a guilty plea to count one of the federal indictment, and admitted that she had committed mail fraud.

4. Bradford has now completed her Pennsylvania incarceration sentence and is entitled to be released. Nevertheless, Bradford's counsel<sup>1</sup> informed the attorney for the government on July 11, 2005, that Bradford wishes to remain incarcerated pending her federal sentencing on October 3, 2005, so that she may continue to earn credit on her impending federal sentence.

WHEREFORE, the government respectfully requests that Bradford's bond be revoked and that Bradford be remanded to the custody of the United States Marshals Service to be detained pending sentencing.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

S/Christian A. Trabold  
CHRISTIAN A. TRABOLD  
Assistant U.S. Attorney  
PA ID No. 75013

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<sup>1</sup> Bradford's counsel, Attorney Thomas Patton, is currently on vacation so Bradford's wishes were made known to the government by FPD investigator John Townely and Attorney Navarre from the Pittsburgh FPD office.